

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Richard Cain, Sr. and Helen L. Cain,
aka Helen L. DeMocko,

Debtors.

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BKCY NO. 19-21025-GLT

Chapter 13

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Rule 9010 of the Bankruptcy Rules, Penn Hills School District is a creditor and hereby appears in this case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices and papers specified by the Rule, and all other notices given or required to be given in this case and all other papers served or required to be served in this case, be given to and served upon:

Jennifer L. Cerce, Esquire
Lawrence J. Maiello, Esquire
Maiello, Brungo & Maiello, LLP – Tax Division
100 Purity Road, Ste. 3
Pittsburgh, PA 15235
Telephone: (412) 242-4400
Facsimile: (412) 727-1667

The foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering of reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in the case with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof,

in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment, or other conduct.

PLEASE TAKE FURTHER NOTICE that the Penn Hills School District intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) their right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; or (2) any other rights, claims, actions, defenses, setoffs, or recoupments to which they may be entitled to under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses setoff, and recoupments are expressly reserved.

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: March 28, 2019

/s/ Jennifer L. Cerce

Jennifer L. Cerce, Esquire

Pa. I.D. No. 81157

424 S. 27th Street, Ste. 210

Pittsburgh, PA 15203

(412) 242-4400

Attorneys for Penn Hills School District

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DECLARATION IN LIEU OF AFFIDAVIT

I certify that this request supersedes any prior request for Notice by this/these creditors, that there is no other request to receive Notices for the specified creditors, and that I am authorized to make this request for Notices on behalf of the named creditors.

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: March 28, 2019

/s/ Jennifer L. Cerce

Jennifer L. Cerce, Esquire
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**CERTIFICATE OF MAILING OF NOTICE OR OTHER
DOCUMENT TO PARTIES IN INTEREST**

Richard Cain, Sr. and Helen L. Cain aka Helen L. DeMocko
6833 Saltsburg Road
Pittsburgh, PA 15235

Paul W. McElrath, Jr., Esquire
McElrath Legal Holdings, LLC
1641 Saw Mill Run Boulevard
Pittsburgh, PA 15210

Ronda J. Winnecour, Esquire
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee
Suite 970, Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

MAIELLO, BRUNGO & MAIELLO, LLP

Dated: March 28, 2019

/s/ Jennifer L. Cerce

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